



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**MEMORANDUM**

**TO:** The Commission  
**FROM:** Commission Secretary's Office  
**DATE:** September 10, 2013  
**SUBJECT:** Comment on Draft AO 2013-12  
(SEIU and SEIU COPE)

**Attached is a timely submitted comment from Michah Lerner.  
This matter is on the September 12, 2013 Open Meeting Agenda.**

**Attachment**



**AO 2013-12**

Michah Lerner to: AO@fec.gov

09/09/2013 11:54 PM

Regarding AO 2013-06, I ask whether fund-initiated telephony is equivalent to written solicitation of retiree-initiated telephony.

Draft AO 2013-12 describes a fund-initiated telephone solicitation for contributions, whereas AO 1999-06 describes a written solicitation with retiree-initiated contact to the OPM toll free number.

A key distinction is compliance-monitoring, as may be required to fully ensure the voluntary nature of contributions.

AO1999-06 solicitation is made via published monthly mailing:

> The National Rural Letter Carrier (SSN 0028-0089) is published monthly, by the National Rural Letter Carriers' Association, 1630 Duke Street, Fourth Floor, Alexandria, VA 22314-3465. Periodicals postage paid at Alexandria, VA and additional mailing offices.

DRAFT AO2013-12, on the other hand, endorses unpublished telephone-based solicitation.

Yours very truly,

Michah Lerner, Ph.D  
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